

August 21, 2014

Michigan Department of Natural Resources
Comments Concerning
Ecological Reference Areas and Dedicated Habitat Areas
VIA: DNR-ForestCertificationComments@michigan.gov



PO Box 8724
Green Bay, WI 54308-8724
Email: lsia@lsia.com

124 West Allegan St., Ste 1000
Lansing, MI 48933

Dear Michigan Department of Natural Resources:

Lake States Lumber Association remains supportive of Senate Bill 78 that would continue allowing the Michigan Department of Natural Resources (MDNR) to manage state owned land for biodiversity through programs that already exist.

We are opposed to the new programs being proposed: *Ecological Reference Areas* (ERA's) and *Dedicated Habitat Areas* (DHA's) will either limit or prevent public access, and either limit or prevent the harvesting of timber on lands that are designated by the MDNR Director.

The former MDNR "Living Legacy" program has now been repackaged into ERA's and DHA's. The singular justification given for this needed action is from a 2013 SCS Global Services Audit claiming that a Major Corrective Action is required.

We strongly believe that the objective of forest management certification should be overwhelmingly about the implementation of scientific sustainable forest management practices and proper harvesting techniques. Not about requiring a certain amount of land to be off limits to the public and certainly not about preventing forest management through the harvesting of timber.

If the FSC program requirements are not directly related to improving active forest management based on science, then FSC has no business using their certification criteria as a tool to advance an agenda that seeks to prevent human activity and disturbance on certain land in the State of Michigan.

The MDNR currently has a plethora of land designations, regulations and laws on the books and available to manage land and to designate for preservation anything they deem as highly desirable. They include but are not limited to:

State Natural areas, State Wilderness areas, State Wild areas, State Parks, State Fish and Wildlife Area State Game areas, State Wildlife areas, Critical dunes, Wetlands, Inland Lakes and Streams, Natural Rivers, Environmental areas, High risk areas. In addition, the MDNR is able to work with federal partners on: National Parks, National Wildlife Refuge, National Lakeshore, Federal Wilderness Areas, Endangered species, Threatened species.

Several of the current designation tools listed above are required to have a public process for each parcel designation. We would even argue that in order to designate public land where the objective is to limit or prevent human disturbance, it should require approval through the legislative process.


To propose upwards of nearly 300,000 acres for ERA/DHA designation through one public process, executed by the MDNR Director's signature alone -- along with, *"The DNR is still working with federal and local ownerships as potential partners, which will likely result in additional ERAs being identified and added to this website in the future", is wrong.*

Again, we are opposed to the proposed designation of Ecological Reference Area and Dedicated Habitat Area programs in the State of Michigan and suggest if necessary, the MDNR explore other certification alternatives that will focus on what forest certification should be all about--improving forest management in the State of Michigan.

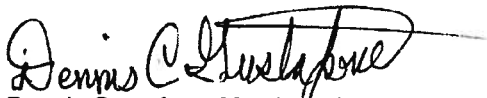
Sincerely,



Scott Sawle, President
Lake States Lumber Association
Rockbridge Saw Mill Inc.,
Richland Center, Wisconsin



Will Borden, Member of the Board
Lake States Lumber Association
Quality Hardwoods Inc.
Sunfield, Michigan



Dennis Gustafson, Member of the Board
Lake States Lumber Association
Besse Forest Products Group
Gladstone, Michigan

cc: Governor Rick Snyder
Senator Tom Casperson
Senator Howard Walker
Senator John Moolenaar
Representative Scott Dianda
Representative Ed McBroom
Representative John Kivela
Representative Wayne Schmidt
Representative Petalia
Representative Lafontaine
Commission on Natural Resources